



Integrity Advocate & FIPPA

Compliance Brief

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Introduction:

Beginning June 10, 2006 online educational services supporting universities and other educational institutions in the province of Ontario were required to comply with the Freedom of Information and Protection of Privacy Act (FIPPA).

Online education services are challenged with providing a participation monitoring and proctoring service that not only incorporates the best possible user experience with robust integrity controls but also adheres to the required privacy protections for learners. FIPPA has created a uniform regulatory framework that now gives rights to individuals when their data is disclosed to the provincial government of Ontario and/or Ontario universities, colleges, hospitals and designated agencies.

Purpose & Scope of FIPPA

The purpose of the FIPPA are as follows:

- A. To provide a right of access to information under the control of institutions in accordance with the principles that,
 - Information should be available to the public,
 - Necessary exemptions from the right of access should be limited and specific,
 - Decisions on the disclosure of information should be reviewed independent of the institution controlling the information; and
 - To protect the privacy of individuals with respect to personal information about themselves held by institutions and to provide individuals with a right of access to that information.
- B. The scope of FIPPA covers all ministries of the Ontario Government and any agency, board, commission, corporation or other body designated as an "institution" in the regulations.



Why does this matter?

The impact of FIPPA on online educational services has been notable. These services have become more accountable for the data they possess. Their records must be organized in terms of what personal data exists, as well as documentation explaining why it has been held, who has access to it as well as other aspects of privacy management.

There is an emphasis on “Privacy by Design”; new information-handling systems and processes must be developed in accordance with new guidelines outlined by FIPPA. In short, personal data must be protected from the very beginning of a product lifecycle.

Framework for Compliance

FIPPA sets out seven key principles that have a direct application to the online education space.

This document explains how Integrity Advocate achieves compliance with FIPPA as it delivers a service to institutions and learners.

#	Key FIPPA Principles	How Integrity Advocate Complies
1	Authority to collect: Limits the collection of personal information by institutions to authorized activities.	Integrity Advocate stands apart from all other service providers because of the effort it makes to limit the collection of personal data. For example, if a user is not permitted to access other browser tabs or programs during their session, Integrity Advocate monitors exactly that and no more. Other providers of the same services make a point of collecting browsing history, copies of desktop files, and lists of programs that go far beyond what is necessary.
	Manner of collection: Ensures the collection of personal information is directly from the individual, except in limited circumstances.	Data collected by Integrity Advocate all comes directly from the individual participating in the session with the exception of only the user's first/last name and email that comes from the Learning Management System (LMS) for the sole purpose of identity verification and user communication.
2	Notice requirements: Informs the individual of the collection of personal information.	Users are presented with the Integrity Advocate privacy policy each time they use the service and need to positively accept it prior to any personal information being collected. Additionally, Integrity Advocate provides instructions and the privacy policy in dozens of languages to ensure users understand what they are accepting.
3	Proper use and disclosure: Limits use and controls sharing or distribution of personal information for authorized activities.	Unlike all other service providers Integrity Advocate provides a review service with the expressed purpose of limiting the sharing of personal information. This is done by redacting unrelated personal information from media shared for the purpose of supporting user violations and preventing unnecessary media sharing when no violations are identified.
4	Accuracy: Ensures processes are in place to keep personal information accurate.	Integrity Advocate findings/data are not subject to change over time and are a snapshot in time thus eliminating the need for updating.
5	Retention: Ensures that an individual can obtain access to their own personal information for a certain period.	Users never have to guess or request access to the data/findings relating to their session because all users receive an email showing any data retained in excess of their user photo.
6	Security: Ensures the security and confidentiality of personal information.	Integrity Advocate is constantly working to exceed all industry best practices with respect to data security and has established the greatest level of protection for personal data by deleting the user identification images and media of compliant users within 24 hours of session completion. Personal data that we don't have cannot be taken.
7	Disposal and destruction: Ensures disposal and destruction of personal information is authorized and secure.	Personal data all has "Time-to-live" characteristics that are applied programmatically when their session is complete that ensures all personal data is deleted exactly as communicated.



Conclusion

Online education services are challenges with providing a participation monitoring and proctoring service that incorporates not only the best possible user experience with robust integrity controls but also adheres with the required privacy protection for learners. Integrity Advocate has demonstrated compliance with FIPPA, allowing for higher education institutions (and more) to utilize our services with confidence that the intent of FIPPA — to **provide right of access and protect privacy** — has been met.

www.integrityadvocate.com

Customer Service Support: +1 (888) 395-1025

CSR Management:

United States: +1 (650) 665-6993 | Australia: +61 2 4050 0222 | United Kingdom: +44 20 8103 9092 | Canada: +1 (226) 407-6583